

Wisconsin's Child Welfare Program Enhancement Plan

*A Response to the Federal
Child and Family Service Review*



Approved November 1, 2004

WISCONSIN’S CHILD WELFARE PROGRAM ENHANCEMENT PLAN

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Preface

This document is Wisconsin's Program Enhancement Plan (PEP) for child protective services in the state. It is one part of our renewed Wisconsin commitment to creating opportunities for all children to grow up safe, healthy and successful.

Our state does better than many states in providing children with health care, education and other opportunities to thrive. Yet we know that Wisconsin, like other states across the nation, does not do enough to protect our smallest and most vulnerable citizens from child abuse and neglect.

We can do better. We are committed to doing better – first, to prevent child abuse and neglect from occurring, and second, to intervene timely and effectively when necessary to protect children who have been victimized. Governor Doyle has directed us to increase our effectiveness in these areas and his KidsFirst agenda has raised child safety, permanence and well being to a high priority in Wisconsin.

We are pleased to be supporting and implementing key elements of the Governor's children's agenda, which is taking a broader look at means of improving the health, safety and success of children and families. This agenda not only expands proven child abuse prevention programs, such as home visitation, but addresses critical elements such as economic security of families as well.

The Program Enhancement Plan is a two-year plan by which the state and its county and tribal partners can implement system-level changes. It was designed to achieve the newly established federal standards for child protective services that are associated with the first-ever, nationwide review of state child welfare systems. Wisconsin welcomed the federal review as an opportunity to learn about past performance of the CPS system, and to engage many partners in planning and implementing improvements. The Program Enhancement Plan is a product of extensive collaboration and focused particularly on establishing and implementing best practices in child welfare that will meet federal standards.

The Program Enhancement Plan will lead to better outcomes for children and better help for families. Of course, improving child welfare practice is both critical for the children and families we serve, and insufficient alone to help children thrive. We know that many families involved in the child welfare system have been affected by low-wage jobs or unemployment, domestic violence, crime victimization, depression and other mental health problems, alcohol and drug addiction, health problems, learning disabilities, and other challenges. To improve the welfare of children, the state must work with a wide range of partners to strengthen economic security of families, and improve access to care and treatment when needed. In general, our systems must become more family-friendly, able to build up family strengths and provide help for their success.

We appreciate the opportunity to be involved in significant national efforts to improve outcomes in child welfare. Wisconsin was chosen as one of 10 states for targeted foster care and adoption initiatives through the national Adopt US Kids program. Wisconsin was also selected as one of 10 states to work with the Pew Charitable Trust on its foster care initiatives. The National Governor's Association has chosen Wisconsin to participate in its Policy Academy on intergovernmental

collaboration; the Departments of Health and Family Services, Workforce Development and Public Instruction are engaged in an initiative to better align the outcomes of child welfare and welfare-to-work programs.

Meanwhile, as we plan system improvements through a variety of strategies, Wisconsin has been hard at work implementing improvements in child protective services. In Milwaukee, where the state is directly responsible for Child Welfare, we are making measurable, substantial improvements in outcomes for children and families that are consistent with good practice standards and our legal settlement agreement. We appreciate the partnership of courts, community agencies and many others in those community efforts.

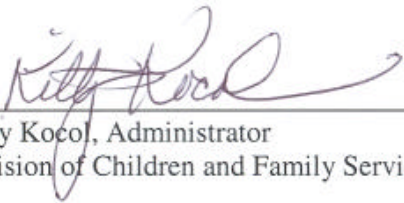
Likewise, Wisconsin counties continue to provide leadership in innovative efforts that include regional, interagency cooperation in the purchase and coordination of services, as well as implementation of Coordinated Services Teams and Integrated Services Teams to increase family-centered practice in child welfare and behavioral health. Cross-system collaboration continues at the local level through memoranda of understanding and training with domestic violence service providers and law enforcement. In addition, the Department of Health and Family Services continues work with the state's sovereign Indian tribes on implementation of Wisconsin's Tribal Child Welfare Plan. Through these efforts, we have seen improvement in child welfare in our state and will see more.

We also appreciate the interest of the Wisconsin Legislature in finding solutions through better laws. We benefit from the commitment of philanthropic partners, whose interest in child welfare and the well being of children is helping seed systems change.

Finally, the Program Enhancement Plan has been produced in the context of Wisconsin's larger, five-year Child and Family Services Plan submitted in June 2004, of which this plan represents the first two years. As we submit this plan to the U.S. Department of Health and Human Services Administration for Children and Families for review and ultimate approval, we thank our federal colleagues for their commitment to the well being of children and families in our state and nation.



Helene Nelson, Secretary
Wisconsin Department of Health and Family Services



Kitty Kocot, Administrator
Division of Children and Family Services

Glossary of Acronyms for the Wisconsin PEP

Act 109 = 2001 Wisconsin Act 109 enacted in July 2002 that provided additional state statutory direction for implementation of AFSA and federal Title IV-E requirements

Area Administration = Department of Health and Family Services regional office staff in the Office of Strategic Finance that provide technical assistance to local child welfare agencies

ASFA = Adoption and Safe Families Act, particularly the ASFA requirement to pursue TPR after a child has been in OOHC for 15 months

BMCW = Bureau of Milwaukee Child Welfare in DCFS, the state-operated child welfare agency for Milwaukee County

BPP = Bureau of Programs and Policies in DCFS, the state unit responsible for child welfare program policy and practice standards

BRL = Bureau of Regulation and Licensing in DCFS that licenses child placing agencies, child welfare facilities and child care facilities

BMHSAS = Bureau of Mental Health and Substance Abuse Services in Division of Disability and Elder Services, the state agency for mental health and substance abuse services in Wisconsin

CCAP = Consolidated Court Automation Program that is used by courts to manage cases and court records

CFSR = Child and Family Services Review

CFS 40 = DCFS form used to collect information on child abuse and neglect investigations previously used by Wisconsin to collect data for NCANDS purposes

Ch. HFS 38 = DCFS administrative rule on treatment foster care

Ch. HFS 44 = Proposed DCFS administrative rule on reasonable efforts and permanency planning

Ch. HFS 54 = DCFS administrative rule regulating child placing agencies

Ch. HFS 56 = DCFS administrative rule on foster home licensing

Child Welfare Training Council = State body for coordinating child welfare training including DCFS, Counties, BMCW and the university-based Training Partnerships

Counties = County human or social service departments providing child welfare services

CPS = Child protective services

CY = Calendar Year (January – December)

DCFS = Division of Children and Family Services, the state child welfare agency in Wisconsin

DHCF = Division of Health Care Financing, the state Medicaid agency in Wisconsin

DHFS = Department of Health and Family Services, the state human service agency that includes DCFS, DHCF and BMHSAS

DOJ = Department of Justice, the state law enforcement agency in Wisconsin

Driver County = County of larger size or particular caseload characteristics that has a significant impact on statewide performance

DSCO = Director of State Courts Office, the agency responsible for state court operations in Wisconsin

ESC = Child Welfare Executive Steering Committee

FFY = Federal Fiscal Year (October – September)

HSRS = Human Services Reporting System. The Child Substitute Care module of HSRS was previously used by the state to collect data for AFCARS foster care purposes. The Adoption module of HSRS is still used to collect data for AFCARS adoption purposes.

ICWA = Indian Child Welfare Act

OLC = Office of Legal Counsel in the Department of Health and Family Services

Ongoing Service Standards = The Ongoing Child Protective Services Standards and Practice Guidelines issued by DCFS that establish program standards for ongoing child welfare services

OOHC = Out-of-home care including children placed under court order in foster care, group homes, residential care centers and kinship care. Equivalent to the federal definition of foster care.

OPEP = Office of Policy Evaluation and Planning in DCFS, the child welfare data office

PACE = A competency-based pre-service training curriculum for foster and adoptive parents

PEP = Wisconsin Program Enhancement Plan (equivalent to program improvement plan)

PEP Core Team = Statewide multidisciplinary group that developed the PEP

PEP Implementation Team = Statewide multidisciplinary group for implementation of the PEP

Q = Quarter during the PEP period

QA = Quality assurance program

QA Contractor = New DCFS contractor for statewide quality assurance program

Resource Center = New DCFS contractor for foster care and adoption resource center

SNAP = Special Needs Adoption Program operated by DCFS

Training Partnerships = University-based, regional child welfare training providers

TPR = Termination of parental rights

WFAPA = Wisconsin Foster and Adoptive Parent Association

WiSACWIS = Wisconsin Statewide Child Welfare Information System (SACWIS system)

WiSACWIS Project Team = Staff supporting WiSACWIS system operation

Background: Wisconsin's Child Welfare Program

Wisconsin's child welfare program includes child protective services (CPS) designed to identify children who are not safe from abuse or neglect, implement plans to ensure their immediate safety, and provide services to change conditions in the home to assure their long-term safety. Each year, CPS workers respond to more than 40,000 referrals concerning children and their safety. The role of CPS workers is to receive and respond to reports of child maltreatment by assessing the family conditions that contribute to or mitigate the risk of maltreatment and developing plans to prevent further harm to these children. CPS work includes arranging services so that families can better provide for the safety of their own children. When necessary, it also includes removing children from home and placing them in out-of-home care, including with a relative when appropriate, to ensure their safety.

Child welfare staff are also responsible for finding permanent living arrangements for children in a timely manner. First and foremost, permanency means helping families by offering them services to improve conditions within their homes so that they are safe enough for the return of their children. But permanency also means that a plan must be simultaneously developed for children whose families – even with support and assistance – are not able to provide an adequate level of safety. For these children, it is vital to find the best possible permanent homes, either with relatives (so that positive relationships with other family members can be maintained), or with loving, nurturing adoptive families who can support and protect them. For other children placed in out-of-home care for juvenile justice reasons or due to needs requiring special care, permanency includes finding ways to return children to their homes by assisting families to control their behavior or care for their special needs.

There are seventy-two (72) public child welfare programs in Wisconsin – one in each county with services provided by county human or social service departments and the Bureau of Milwaukee Child Welfare in Milwaukee County. In addition, the eleven (11) sovereign Indian tribes each provides child welfare services. The Division of Children and Family Services (DCFS) is the state child welfare agency that guides, supports and supervises the delivery of child welfare services at the local level and is one of five divisions in the Wisconsin Department of Health and Family Services (DHFS). In 71 of Wisconsin's 72 counties, the county departments are responsible for staffing and operating child welfare programs that serve their county residents, and DCFS provides policy direction, funding and program oversight. In addition, DCFS operates two direct service programs including the Bureau of Milwaukee Child Welfare which serves families in Wisconsin's largest county and the statewide Special Needs Adoption Program which finalizes more than 1,100 adoptions a year.

To improve the child welfare program statewide, it is important to understand the relationship between DCFS the state agency and the county agencies responsible for providing child welfare services. The state provides approximately half of the funds (including federal funds) for child welfare services and counties provide the other half. Each county agency is responsible to a county board of supervisors which determines the level of local funds for child welfare services and sets local policy regarding the delivery of services. As such, child welfare program changes that have fiscal implications are subject to approval by both the State Legislature and seventy-one (71) county boards of supervisors.

Wisconsin's CFSR Findings

In August of 2003, Wisconsin's child welfare program was evaluated by the federal Administration for Children and Families (ACF) and was the 43rd state program to undergo this Child and Family Services Review (CFSR) process. As it did in every state, the ACF in partnership with the state child welfare agency reviewed 50 cases in three counties which were intended to represent performance across the state, held focus groups with key stakeholders, evaluated program outcome data, and evaluated the state self-assessment. The CFSR process sets very high standards for states, so like every other state in the nation, Wisconsin was found in substantial non-conformance with several outcomes and systemic factors and many individual CFSR performance items. The state received its CFSR findings from ACF on January 14, 2004, and was given 90 days to produce a statewide program improvement plan in response. The plan must produce measurable progress within two years toward improving outcomes for both children and improving the systemic factors that support child welfare program operations statewide.

The following outcome items must be addressed in the PEP:

Safety Outcome 1: Children are first and foremost protected from abuse and neglect.

Item 1: Timeliness of initiating investigations of reports of child maltreatment

Note: Item 2 was rated a strength in the on-site case review, but recurrence of maltreatment must be addressed in the PEP because Wisconsin did not meet the national standard on recurrence of maltreatment.

Safety Outcome 2: Children are safely maintained in their homes when possible and appropriate.

Item 3: Services to families to protect children in home and prevent removal

Permanency Outcome 1: Children have permanency and stability in their living situations.

Item 6: Stability of foster care placement

Item 7: Permanency goal for child

Item 8: Reunification, Guardianship, or Permanent Placement with Relatives

Item 9: Adoption

Item 10: Permanency goal of other planned permanent living arrangement

Note: Item 5 was rated a strength in the on-site case review, but re-entry to out-of-home care must be addressed in the PEP because Wisconsin did not meet the national standard on re-entry to out-of-home care.

Permanency Outcome 2: Continuity of family relationships and connections are preserved for children.

Item 12: Placement with siblings

Item 13: Visiting with parents and siblings in foster care

Item 14: Preserving connections

Item 15: Relative placement

Item 16: Relationship of child in care with parents

Well-Being Outcome 1: Families have enhanced capacity to provide for their children's needs.

Item 17: Needs and services of child, parents, and foster parents

Item 18: Child and family involvement in case planning

Item 20: Worker visits with parents

Well-Being Outcome 3: Children receive adequate services to meet their physical and mental health needs.

Item 22: Physical health of child

Item 23: Mental health of child

The following systemic factors must be addressed in the PEP:

Case Review System

Item 25: Process for developing a case plan and for joint case planning with parents

Item 28: Process for seeking TPR in accordance with ASFA

Item 29: Process for notifying caregivers of reviews and hearings and for opportunity for them to be heard

Quality Assurance (QA)

Item 31: Identifiable QA system that evaluates the quality of services and improvements

Staff and Provider Training

Item 32: Provision of initial staff training

Item 33: Provision of ongoing staff training that addresses the necessary skills and knowledge

Item 34: Provision of training for caregivers and adoptive parents that addresses the necessary skills and knowledge

Service Array

Item 35: Availability of array of critical services

Item 36: Accessibility of services across all jurisdictions

Indian Child Welfare

Under Item 38, regarding ongoing consultation with stakeholders in developing the Child and Family Services Plan, DCFS was directed to improve consultation with tribes.

The following national performance standards must be addressed in the PEP:

Safety Outcome 1: Recurrence of maltreatment

Safety Outcome 2: Maltreatment while in care

Permanency Outcome 1: Re-entry to care

Permanency Outcome 2: Time to reunification

Permanency Outcome 3: Time to adoption

For more information about the federal CFSR findings, see the "Child Welfare in Wisconsin, a Report on Wisconsin's Child and Family Services Review" posted to the DHFS web site at <http://dhfs.wisconsin.gov/cwreview/cfsr/cfsr-docs/RptSum2-6-04.pdf>.

The Development of Wisconsin's Program Enhancement Plan

The Wisconsin Program Enhancement Plan (PEP) is the state plan to improve specific aspects of child welfare services in response to the federal CFSR findings. The PEP was created through a collaborative process that occurred over a period of seven months beginning in September 2003 following the on-site portion of the CFSR review. Development of the PEP was guided by an internal planning team consisting of the DCFS Administrator, Bureau and Office Directors, and a Facilitator. The internal planning team recruited more than sixty (60) child welfare experts to form a statewide PEP Core Team. The PEP Core Team met on a regular basis from September 2003 through March 2004 to develop the overarching strategies for improvement and the specific action steps included in the plan. See Appendix A for a list of the PEP Core Team members.

The PEP Core Team began by identifying the underlying conditions in families, communities, child welfare agencies, and state government that impact child welfare program operations and Wisconsin's CFSR performance. Based on the underlying cause analysis, the Core Team identified and prioritized strategies and action steps that could improve CFSR outcomes within specified timeframes. The Core Team also suggested methods for measuring progress in improving program outcomes.

The Core Team selected the twenty (20) PEP action steps by applying three strategic criteria. For inclusion in the final PEP, an action step must be: 1) effective in addressing specific CFSR findings; 2) substantially achievable within two years; and 3) practicable within the constraints of the current environment and the authority of child welfare agencies. Because Wisconsin is subject to financial penalties that will reduce its federal funding for child welfare if it fails to implement its chosen strategies and meet its targeted goals, the Core Team took great care in the strategy selection process. The complete list of action steps including benchmark tasks, measurement methods and deadlines for completion are outlined in the Program Enhancement Plan Matrix.

Wisconsin's sovereign tribes were partners in the PEP development, but pre-dating the PEP process, tribal child welfare staff and DCFS staff had already begun work on a plan to improve child welfare services for Indian families in Wisconsin. The PEP incorporates key aspects of the tribal plan that affect Indian Child Welfare Act implementation as covered in the federal CFSR, and tribal members expressed support for and endorsement of the PEP as an important initiative in improving child welfare services. In conjunction with the PEP process, the tribes and DCFS developed a comprehensive list of issues to work on jointly to improve tribal child welfare services. The Tribal Child Welfare Plan is attached as Appendix B and was also included in the Wisconsin Child and Family Services Plan submitted to ACF in June 2004.

The overall preparation for the CFSR process was guided by the Wisconsin Child Welfare Executive Steering Committee (ESC) consisting of representatives from the State Legislature, courts, state agencies and other stakeholders of the child welfare program. The ESC provided guidance in identifying issues that were addressed in the CFSR Statewide Assessment submitted in June 2004 prior to the on-site case review. Members of the ESC participated as case reviewers and in stakeholder interview groups. The ESC also reviewed and endorsed the PEP strategies in February 2004 prior to submission. See Appendix C for a list of the ESC members.

As Wisconsin proceeds with the implementation of the PEP, DCFS will form the PEP Implementation Team, which will include members from the ESC, PEP Core Team and other stakeholders to reflect the many and varied disciplines involved in the provision of child welfare services. The Implementation Team will provide a forum for cross-system collaboration on child welfare program issues and advise DCFS on PEP-related matters. The Implementation Team will review progress in implementing the PEP including achievement of performance goals as well as strategies in the Wisconsin Child and Family Services Plan. The Implementation Team will meet quarterly with the first meeting anticipated to take place in November 2004.

DCFS will also establish committees under the PEP Implementation Team which will be comprised of members of the Implementation Team, county, tribal and state staff, and related professionals. The committees will meet as needed and will report to the Implementation Team on a regular basis. The committees will be staffed by DCFS and the work of the committees coordinated with internal DCFS policy processes. See Appendix E for a description of the PEP Implementation Team and the related committees.

Implementation of individual action steps in the PEP will involve project-specific work groups to develop policy and procedure for individual action steps or benchmark tasks within action steps. The work groups will be used to analyze issues, make recommendations, and assist in the development of policy memos, program standards and administrative rules. These work groups will allow for the development of policy and procedure in a collaborative manner working closely with county child welfare staff and other interested parties. The work groups will ensure that local agency concerns are addressed in the development and implementation of PEP-related policy and procedure.

Overarching Strategies for Improving Child Welfare in Wisconsin

The PEP Core Team articulated seven overarching strategies to guide the development of specific action steps for the PEP. The strategies provide the organizational framework for the PEP and ensure PEP action steps are focused on the safety, permanence and well being of children. Each of the 20 action steps in the PEP is related to one or more of the overarching strategies, as shown below. The strategies were also used by DCFS with the PEP Core team and other stakeholders in the Spring of 2004 to identify long-term objectives for Wisconsin's five-year Child and Family Services Plan that was submitted to ACF in June 2004.

These overarching strategies will:

1. Help families strengthen their capacity to provide a safe and nurturing environment for their children;
2. Improve Wisconsin's capacity to provide quality foster care to children when they cannot be safe at home;
3. Strengthen and diversify the child welfare workforce and build our capacity to serve families and keep children safe;
4. Assure that the expectations of families and the actions of child welfare professionals are guided by clear and comprehensive policies and standards of practice;
5. Collaborate with agencies and systems to improve family access to services that ensure children are safe and healthy;
6. Improve the quality and usefulness of information needed to evaluate the safety, permanence and well being of children; and
7. Assure the quality and effectiveness of services for children and families by regularly reviewing our programs and practices.

PEP Action Step	1	2	3	4	5	6	7
A. Define scope of CPS services				X			
B. Safety assessment and planning	X		X	X	X	X	X
C. Stabilize placements and reduce re-entry		X		X		X	X
D. Placement in permanent or adoptive homes				X	X		X
E. Sibling placement		X		X			X
F. Family visitation and interaction	X	X		X			X
G. Compliance with ICWA requirements				X		X	X
H. Use of relatives for placement		X	X	X			X
I. Involve non-custodial parents	X		X	X	X		X
J. Ongoing Service Standards	X			X		X	X
K. Support to foster parents		X	X		X		X
L. Managed care program		X			X		
M. Mental health screening		X			X		
N. Family involvement in case planning	X			X	X		X
O. Termination of parent rights process				X	X		
P. Role of foster parents in hearings		X		X			X
Q. Statewide quality assurance program				X		X	X
R. Expand child welfare training			X			X	
S. Enhance BPP capacity			X	X	X		
T. Capacity to meet safety and permanency needs	X	X	X		X		

Summary of Wisconsin's PEP Action Steps

The action steps Wisconsin will take to improve child safety, permanency and well being are enumerated in the Matrix portion of the PEP. The PEP Matrix includes 20 specific action steps to improve child welfare program outcomes and systemic factors. The action steps are comprised of multiple benchmark tasks designed to accomplish the objective of the action steps. Some of the benchmark tasks contain additional subtasks. In total, the PEP includes over 100 specific actions that will be undertaken to improve safety, permanency and well being during the two-year PEP period. The PEP Matrix describes the specific actions and the projected time frames for completion of those actions during the two-year PEP period.

By implementing the PEP and the tasks itemized in the PEP Matrix, Wisconsin expects to:

- Increase its ability to help children remain safely at home by updating policy and training and increasing technical assistance for child welfare workers on safety assessment and safety planning.
- Ensure that the impact of underlying issues (e.g., domestic violence and/or mental health and substance abuse problems of parents) on child safety is elevated in the initial or family assessment process and related staff training.
- Ensure that the CPS Ongoing Services Standards and Practice Guidelines effectively and appropriately guide case workers in assessing and responding to the needs of children, their parents and foster parents.
- Improve the safety of children and the efficiency of and consistency among child welfare programs system-wide by more clearly defining the scope of child protective services (CPS) cases and the intake and assessment standards that guide workers.
- Place greater emphasis on involving families in their own case planning, on the identification and safe involvement of non-custodial parents and their relatives, and on ensuring siblings placed in out-of-home care are placed together.
- Work with children's mental health experts and county and tribal child welfare agencies to develop a statewide policy on the screening and assessment of the mental health needs of children who have been abused or neglected. Provide support to workers through training and technical assistance to identify mental health issues of children and parents and address them in the ongoing services case plan.
- Reduce the time for and increase the efficiency of placing children in adoptive or otherwise permanent homes when they can no longer live safely with their parents through policy revision, staff training, and elimination of redundant or unnecessarily bureaucratic practices.

- Stabilize placements of children in foster care and reduce the actual and statistical re-entry of children in the foster care system by a) analyzing and addressing the causes of placement instability; b) requiring an emergency response plan for children entering foster care; and c) defining trial home visits.
- Improve the process for determining when the Termination of Parental Rights (TPR) is appropriate for children and expediting the TPR process when it is pursued.
- Increase the effectiveness of support services for foster and adoptive parents by improving the visibility of and access to information, training and resources. Establish a Foster and Adoptive Parent Resource Center that can provide access to basic information and referral to agencies and services.
- Create a model foster parent handbook and require all licensing agencies to adapt it to reflect local agency practice and procedures.
- Implement statewide, pre-service training and ongoing training for foster and adoptive parents.
- Implement an ongoing, statewide media campaign to encourage the recruitment and retention of quality foster families for children.
- Maintain and support family connections for children in out of home care by re-examining and clarifying policies on family participation in case planning, visitation, establishing paternity, and relative searches for possible child placements.
- Assure that all agencies involved in the child welfare service system are aware of and comply with the requirements of the Indian Child Welfare Act.
- Clarify the authority, responsibility, and role of foster parents and other physical custodians in participating in reviews and court hearings.
- Design and implement a comprehensive, statewide Quality Assurance System that focuses on quality improvement and building on strengths. Support the efforts of local child welfare agencies to maintain an environment that encourages learning and program improvement.
- Support the efforts of local child welfare agencies to maintain an environment that encourages learning and program improvement.
- Expand training for child welfare staff by establishing initial and ongoing training requirements and make training more accessible to local agencies and more applicable to working with families.
- Survey and document the workload requirements and corresponding staffing needs of local child welfare agencies, and evaluate the availability and accessibility of services for families that support child protection and well being.

Improvement of Systemic Factors

The federal CFSR findings identified the need for improvement in the systemic factors that support the statewide delivery of child welfare services, including case review process, staff and provider training, quality assurance, and service array. The CFSR findings also identified the need to improve implementation of the Indian Child Welfare Act (ICWA) and consultation with Indian tribes on child welfare program issues.

Wisconsin is committed to taking actions that will improve these systemic factors that support effective delivery of child welfare services. Action steps in the PEP Matrix include:

Case Review Process: PEP Action Steps J and N address CFSR Item 25 regarding the joint development of case plans with the family by updating the Ongoing Services Standards to require family engagement in the assessment and plan process, how to match services with family needs, and provide direction on caseworker contact with families. Action Steps D and O address CFSR Item 28 pertaining to Termination of Parental rights (TPR) by supporting concurrent planning and working with the state court system to improve the TPR legal proceedings. Action Step P addresses CFSR Item 29 regarding foster parent participation in permanency reviews and court hearings to provide direction on the foster parent role and opportunities for participation. DCFS will continue its ongoing collaborative efforts with the Director of State Courts Office (DSCO), which operates the Court Improvement Program, to develop mechanisms for the effective distribution of information and provision of training for judges and other legal staff (e.g., District Attorneys, Court Commissioners, and Corporation Counsels).

Staff and Provider Training: For staff training, PEP Action Step R addresses CFSR Items 32 and 33 relating to initial and ongoing training. A statewide pre-service training program will be developed to ensure staff receive basic training prior to taking child welfare cases. Statewide requirements will be established for caseworker training, including foundation training for core practice skills, ongoing advanced skills training for caseworkers, and foundation and skills training for supervisors. Staff training will be provided through the existing University of Wisconsin Training Partnerships, but the capacity of the Wisconsin child welfare training system will be expanded to provide additional training and take advantage of technology and other training resources to deliver training in the most effective and cost-efficient manner.

For foster parent training, PEP Action Step K addresses CFSR Item 34 relating to foster and adoptive parent training. The existing pre-service training program will be expanded so that all foster parents receive consistent pre-service training statewide. An ongoing training program will be developed for foster and adoptive parents along with establishing statewide training requirements.

Training is identified as a benchmark task for many of the PEP action steps. The training for specific policies and procedures will be provided in a number of ways, including presentations by DCFS staff at regional meetings, training county staff/service providers to be trainers within their agencies, adapting the curriculum of existing training courses to include new PEP-related material, and working with other agencies such as DSCO to include PEP-related information in their training materials. The PEP Matrix explains the specific approaches for training related to benchmark tasks.

Quality Assurance: PEP Action Step Q explains how a statewide quality assurance (QA) process will be implemented to address CFSR Item 31 by conducting county reviews on a regular basis using CFSR-style case reviews with peer reviewers and stakeholder interviews. The approach to QA will be proactive, using the information from reviews to assist agencies to further develop their strengths and improve child welfare practice. Wisconsin currently conducts case reviews in the Bureau of Milwaukee Child Welfare (BMCW), so development of the statewide QA process will concentrate on implementing a case review process with the other 71 counties. The statewide county review process will be informed by and coordinated with the existing comprehensive case review process in BMCW, which is done for lawsuit monitoring purposes and includes CFSR-style case reviews. DCFS will continue the work already in progress with the National Resource Center on Organizational Improvement to develop a state case review process that mirrors the federal CFSR case reviews while providing the opportunity to examine other aspects of child welfare program operations that are not part of the federal CFSR process.

The case review process will provide a mechanism to thoroughly assess safety, permanency and well being of children and families at the local level, ensure compliance with program requirements and identify needs of local agencies for training, technical assistance and other support to improve the quality of case practice. Case reviews will be conducted on an annual basis by BMCW in Milwaukee, every other year for the 10 largest counties that (in addition to Milwaukee) drive statewide outcome performance, and every six years for the remaining counties for a total of sixteen (16) reviews each year. The schedule may be changed over time depending on the available QA resources, efficiency of the review process, and the need for follow-up with individual counties on specific practice issues. Other action steps in the PEP include QA components, including Action Step G relating to ensuring compliance with ICWA requirements.

The data from the statewide QA case reviews will be used to produce information for measurement of state progress on CFSR outcome achievement. For many of the CFSR outcomes items, the case review results will be the primary method of measuring progress in achieving improvement targets. To provide better baseline data for the CFSR outcome items, limited case reviews will be conducted in Quarter 3 of the PEP using the federal CFSR case review instrument. (See Page 19 and the progress report note in Action Step Q for more information.) Using the federal CFSR instrument as a starting point, a state case review instrument will be developed to meet both PEP and state QA needs and the statewide case review process will be piloted in Quarters 3 and 4. The full statewide cycle of 16 reviews will begin in Quarter 5. During the first year of the PEP, data from the limited case reviews, pilot reviews and BMCW case reviews will be used to measure progress.

As part of the overall QA process, efforts will be made to work with local agencies to improve data quality. Reports using data from the WiSACWIS system will be developed to provide each county with information on important processes that affect CFSR outcome items. In addition, WiSACWIS reports that provide county-level information on the national standards will be shared to assist counties in determining how their local caseloads drive statewide outcomes. Particular efforts will be made with the 10 to 12 “driver” counties with the largest caseloads or unique caseload characteristics that have the most impact on particular program outcomes, including analyzing caseload trends and data entry practices within those counties.

Service Array: PEP Action Step T describes analysis that will be done to determine gaps in services and child welfare agency workloads to address CFSR Items 35 and 36. The DCFS will use the service inventory results to work with sister divisions in the Department of Health and Family Services and other state agencies to develop strategies to fill service gaps. Collaborative efforts will be used to develop local service capacity, county consortiums and other strategies to more effectively use existing resources. The workload analysis will be used by DCFS to evaluate options to improve the state financing methods used to provide local agencies with state and federal funds.

Action Steps L and M describe actions that will be taken to improve medical and mental health services for children in the child welfare service system. For mental health in particular, steps will be taken to improve the process for screening the mental health needs of children as they enter out-of-home care to ensure that mental health service needs are identified. Revisions of the Ongoing Services Standards and additional technical assistance to local agencies will ensure that service needs are effectively identified in cases plans and that agencies provide families with access to needed services.

Tribal Child Welfare: Action Steps F and G address the specific CFSR findings related to ICWA. Actions will be taken to ensure that county agencies notify tribes promptly and consistently when Indian children enter out-of-home care and collaborate with tribes on achieving permanency for the children. DCFS will work with other state agencies to make ICWA requirements known to all key stakeholders who work with Indian children. In addition, DCFS is hiring an Indian child welfare specialist position to work on compliance issues and provide technical assistance to counties and tribes.

As described in the section on PEP development, DCFS has worked collaboratively with tribes to actively involve them in the PEP process. Most of the PEP Action Steps include one or more Benchmark Tasks associated with the relationship among DCFS, the counties, and the tribes. In addition, DCFS has worked with the eleven (11) federally-recognized tribes in Wisconsin in the development of seven priorities identified by the tribes as critical factors in improving child welfare services for Indian children and their families. (See Appendix B.) DCFS staff have been working for the last eighteen (18) months with tribal child welfare representatives to discuss the federal CFSR, the PEP, the seven priorities, and related matters. This collaboration will continue through bimonthly meetings between DCFS and tribal staff.

In addition, the Department of Health and Family Services held a high-level meeting in September of 2004 between the DHFS Secretary and Division Administrators and the Chairpersons of Wisconsin's Tribes. This first meeting was designed to begin discussions on the establishment of a consultation process between the Department and Tribes to assure that ongoing consultation and communication are institutionalized and ongoing. Tribes will be invited to provide representation to the PEP Implementation Team and all workgroups and other committees that may be established. DCFS will also provide ongoing feedback on the PEP process to all tribes through the bimonthly meetings described above.

Resources for PEP Implementation

Wisconsin is committed to both short and long-term improvements in its child welfare program. The PEP is a short-range (two-year) action plan that the DCFS and its county and tribal partners can implement within existing resources and state statutes. The PEP strategies focus on clarifying child welfare policy, building quality improvement in child welfare practice and programs, increasing training, and providing more effective management information to support these efforts. Other actions to promote long-range system improvement will be addressed by the State in other child welfare initiatives, including the five-year Child and Family Services Plan and Governor Doyle's KidsFirst initiative. As a short-term plan, the PEP does not include actions that require statutory changes as legislative action cannot be assured within the PEP period as well as actions that require increases in state appropriations given the current state fiscal circumstances.

To implement the PEP strategies, the DCFS will utilize existing position resources and work within currently available dollars at the state and local levels. New workload at the state level in the areas of policy development, technical assistance, quality assurance, and data reporting will be met by reallocating existing state positions and using contractor staff that will be supported by funds made available by refinancing current DCFS programs. The PEP staff resources will be devoted to ensure that DCFS can provide guidance and support to child welfare agencies to implement the PEP strategies at the local level and develop local program improvement objectives. DCFS has reallocated the positions and is currently in the process of filling the positions. (See the progress report note in Action Step S for more information.)

Using the reallocated funds, the DCFS will create a statewide foster and adoptive parent resource center, establish a statewide quality assurance program that includes CFSR-style case reviews, expand the capacity of the child welfare training system, and strengthen the ability of the Bureau of Programs and Policies to provide policy direction and technical assistance. To more effectively implement ICWA in Wisconsin, one of the redeployed positions will be filled as an Indian child welfare program specialist.

To assist counties with the implementation of PEP strategies, the DCFS is making additional funds available for the period of calendar years 2005 – 2007 through the Children and Families Incentive program and the Promoting Safe and Stable Families program. County agencies will complete local plans in the Fall of 2004 to determine how the additional funds will be used at the local level to meet program improvement needs related to the PEP.

It is well understood that child welfare program outcomes are affected by caseloads for workers and supervisors, as well as by the availability of support services for families. Counties have expressed concerns that the current state funding mechanisms do not address workload issues. It is also well-recognized there has been a history of limited state investment in child welfare services, and that it will take time, especially given the current state financial circumstances, to build the capacity of counties to achieve better outcomes for the families they serve. Our first obligation is to use existing resources as wisely and effectively as possible. The PEP also commits to quantify needs and options for services and staffing for consideration in future state budgets.

Format of Program Enhancement Plan Matrix

The PEP Matrix identifies specific action steps based on the seven overarching strategies that will be implemented to address areas needing improvement identified in the federal CFSR findings. The format for the Matrix was designed based on the recommended federal format, with technical assistance from the National Resource Center for Organizational Improvement and consultation with the ACF Chicago Regional Office on February 24, 2004. The action steps are formatted to show detailed benchmark tasks, responsible parties for implementation and planned achievement dates. Notes are provided to elaborate on tasks in some instances.

The PEP must be implemented over a two-year period, but the actual starting date has not been determined and will be contingent on the date of plan approval by ACF. Thus, the time frames for completion of tasks is expressed in quarters, with Quarter 1 being the first three months of the PEP period and Quarter 8 being the last three months. It is anticipated that the PEP will be approved in October 2004, so the PEP period will likely run from October 2004 - October 2006. As the PEP is implemented, DCFS will update the time frames for tasks as necessary and specific completion dates will be identified where applicable in quarterly progress reports.

The following information is included for each of the actions steps in the PEP Matrix:

- Specific action steps with defined benchmark tasks that address the federal CFSR findings
- Cross-references with the 7 overarching improvement strategies.
- Measurable goals for improvement on the CFSR performance items.
- The measurement methods that will be used to collect performance data.
- A description of the action step.
- Specific benchmark tasks that describe activities during the PEP period to implement the action step. Benchmarks include subheadings and are numbered to show where multiple benchmark tasks are part of the same activity or project.
- The responsible parties that will carry out the benchmark tasks.
- Completion dates for the benchmark tasks.
- Where applicable, notes are included regarding cross-references to other action steps, details on benchmark tasks, or to provide other information about benchmark tasks the PEP Core Team wanted included in the PEP.

The PEP Matrix format will be used as the basis for the quarterly progress reports that will be submitted by DCFS to ACF over the two-year PEP period. Information will be included in the progress report on the status of benchmark tasks and overall implementation of action steps. The quarterly progress reports will be shared with the PEP Implementation team and widely distributed to other stakeholders. As data becomes available, information on state performance for the CFSR outcome items will be included in the quarterly progress reports based on the WiSACWIS reports and QA case reviews. For action steps related to CFSR systemic factors, the quarterly reports will indicate completion of implementation milestones to demonstrate progress.

Improvement for CFSR Performance Items

As described in the section on the federal CFSR report findings, Wisconsin must address 17 of the 23 outcome performance items pertaining to safety, permanency and well being. For each of the 17 CFSR outcome items, a baseline level of performance must be established and improvement targets established for the two-year PEP period.

Establishing baseline levels of performance for the 17 outcome items is a challenge for Wisconsin. The DCFS has historically not measured the performance of county agencies in ways comparable to the specific CFSR safety, permanency and well being items. State data collection to date has been limited to collecting basic caseload information and information needed for federal NCANDS and AFCARS purposes. In preparation for the CFSR process, DCFS developed reports in the WiSACWIS system that mirror the six national standards pertaining to safety and permanency and conducted several limited case reviews using the federal CFSR instrument. However, the use of these reports is limited due to the impact of conversion to WiSACWIS by BMCW, the Special Needs Adoption Program (SNAP) and counties statewide over the period of March, 2000 to July, 2004. The majority of counties came up on the system in CY 2003 and the first half of CY 2004, and with conversion issues and the learning curve for staff to properly enter information into the system, data quality must be improved before the WiSACWIS reports will be reliable indicators of true performance. The limited case reviews were done primarily as practice exercises for the August 2003 CFSR on-site review and thus the case scores from those limited reviews are not useful as indicators of statewide performance. Comprehensive case reviews have been done by BMCW in Milwaukee for several years, but it was not until 2003 that the case review process was adopted to be consistent with the federal CFSR approach. So at the current time, Wisconsin does not have reliable state baseline data for the 17 outcome items.

To establish baseline levels for the PEP, Wisconsin will initially use the scores from the August 2003 CFSR on-site review for the 17 outcome items. While the CFSR scores are used by ACF to assess state conformance with the federal CFSR criteria, there are concerns about using the CFSR scores as true indicators of statewide performance. The scores are based on the review of only 50 cases from three counties, including Milwaukee as the largest urban county and two other primarily urban counties, so the sample size is small and not representative of counties statewide. For some performance items, the CFSR scores are based on a very small number of cases as the item was not applicable to all of the 50 cases. For example, the scores for Item 9 (adoption) and Item 10 (other planned living arrangement) were based on only six cases for each item. While the cases were drawn at random, the small number of cases makes the CFSR scores for individual outcome items highly unreliable as an indicator of actual child welfare program performance statewide. In addition, the selection bias of the cases being from primarily urban counties makes the CFSR scores not representative of impact of rural areas on statewide child welfare program performance.

DCFS is currently working to provide better baseline performance information for each of the 17 outcome items. Additional baseline information will be developed using new WiSACWIS reports that will be developed by DCFS. As noted in Action Step R.3, additional training will be provided to support accurate and timely entry of information by caseworkers into the system. Information for Milwaukee is available from the BMCW case reviews. In addition, additional CFSR-style case reviews will be conducted statewide to collect more case-specific scores to add to the scores from

the August 2003 on-site review so that the samples of cases used for baseline purposes is larger and more representative of statewide practice. These case reviews will be done under Action Step Q.2 using the federal CFSR instrument, but using primarily information from case files and caseworker interviews and fewer interviews with other case participants than the full CFSR approach.

With the new WiSACWIS data and additional case review scores, DCFS will be able to provide more reliable baseline information for the PEP. Baseline performance levels are anticipated to change over the two-year PEP period due to having as information for a more representative mix of counties. Depending on the DCFS analysis of the new information, updated baselines will be proposed based on the new data or a combination of new data and the 2003 CFSR scores. The additional information will be provided to ACF as data becomes available and DCFS will work with the ACF Chicago Regional Office to request adjustments to the baseline performance levels as necessary to reflect the newer data.

Many of the WiSACWIS reports that will be used for the CFSR outcome items need to be developed by DCFS. DCFS is currently working with the WiSACWIS project team to make report writing resources available to develop the reports by early 2005. Some reports may initially be constructed to provide limited information for the PEP and then developed into more robust reports that can be used for county program management purposes over time. For some of the CFSR outcome items, existing WiSACWIS federal outcome reports designed for the national standards will be used to measure progress. The code for these reports was reviewed by the Children's Bureau and minor changes will be made to the reports based on the federal staff review of the report code.

On an ongoing basis, the major source of information to determine state improvement on the CFSR outcome items will be the statewide QA process that includes CFSR-style case reviews of counties on a regular cycle. Implementation of the QA process is a high priority for DCFS in the initial year of the PEP period. DCFS has completed the procurement for the statewide QA contract and will implement the quality assurance contract in Quarter 1 of the PEP. Once contractor staff have been hired and oriented, limited case reviews will be conducted as described in Action Step Q.2 leading up to starting the regularly cycle of county reviews by Quarter 5. The results from the regular county reviews will be used to provide progress reports on the ongoing state performance for the CFSR outcome items. The results from the regular case reviews may also be used to further refine the baseline performance levels.

From the federal perspective, the PEP is a compliance plan that can result in Wisconsin being subject to financial penalties for failure to achieve the improvement goals or targets established in the PEP. Considering the need for Wisconsin to build its data collection and management capacity and the unreliability of the currently available baseline performance data for the 17 outcomes items, Wisconsin will set prudent and conservative improvement targets for the most critical outcome items. For these items, Wisconsin proposes to establish the performance improvement targets at 1% for the first year of the PEP and 2% for the second year of the PEP. Other items will be measured for state improvement purposes. These improvement targets take into account that federal penalties could be incurred for any of the outcome items that the state falls short in achieving the PEP improvement target. However, it cannot be stressed strongly enough that Wisconsin is committed to making significant improvements in its child welfare program and will strive to exceed these improvement targets by the end of the PEP period.

Outcome Factor	Item #	Description	Initial PEP Baselines *	PEP Year 1 Targets	PEP Year 2 Targets
Safety 1	1	Timeliness of CPS investigations	61%	+ 1%	+ 2%
Safety 1	2	Recurrence of maltreatment **	95%	Met Standard	Met Standard
Safety 2	3	Services to prevent removal	84%	+ 1%	+ 2%
Safety 2	4	Risk of harm to child	86%	Met Standard	Met Standard
Perm.-1	5	Out-of-home care re-entry **	100%	Met Standard	Met Standard
Perm.-1	6	Stability of out-of-home care placements ***	76%	Nat'l Standard	Nat'l Standard
Perm.-1	7	Permanency goal for child	60%	State Goal	State Goal
Perm. 1	8	Reunification, guardianship, and placement with relatives ***	46%	Nat'l Standard	Nat'l Standard
Perm. 1	9	Adoption ***	50%	Nat'l Standard	Nat'l Standard
Perm. 1	10	Other planned living arrangement	83%	State Goal	State Goal
Perm 1	11	Proximity of placement	100%	Met Standard	Met Standard
Perm. 2	12	Placement with siblings	50%	State Goal	State Goal
Perm. 2	13	Visiting with parents and siblings in out-of-home care	54%	State Goal	State Goal
Perm. 2	14	Preserving connections	63%	State Goal	State Goal
Perm. 2	15	Relative placement	65%	State Goal	State Goal
Perm. 2	16	Relationship of child in care with parents	63%	State Goal	State Goal
W. Being 1	17	Needs/services of child, parents, and foster parents	58%	+ 1%	+ 2%
W. Being 1	18	Child/family involvement in case planning	62%	+ 1%	+ 2%
W. Being 1	19	Worker visits with child	88%	Met Standard	Met Standard
W. Being 1	20	Worker visits with parents	77%	+ 1%	+ 2%
W. Being 2	21	Educational needs of child	91%	Met Standard	Met Standard
W. Being 3	22	Physical health needs of child	83%	State Goal	State Goal
W. Being 3	23	Mental health needs of child	69%	State Goal	State Goal

* The initial PEP baselines use the results from the August 2003 CFSR review of 50 cases.

** Improvement targets are established for the national standards applicable to these items.

*** The national standards will be used to measure progress on these items (see page 22).

The improvement targets are based on the August 2003 CSFR score plus the 1% and 2% improvement increments. For example, the August 2003 score for CFSR Item 1 (timeliness of CPS investigation) was 61% of the applicable cases were rated a strength. The improvement targets for CFSR Item 1 based on the 61% baseline are 62% for the first year of the PEP and 63% for the second year. If the baseline is changed over the duration of the PEP, the improvement targets will remain 1% and 2% increments from the baseline.

For CFSR Items 2 and 5, the August 2003 scores showed that 95% and 100% respectively of the cases were rated a strength, which exceeds the 85% level required for an item to be rated a strength. While the CFSR case review showed Items 2 and 5 are strengths, the state does not meet the recurrence of maltreatment and re-entry national standards. Therefore, the improvement targets for recurrence of maltreatment and re-entry are established for the national standards rather than for CFSR Items 2 and 5.

For CFSR Items 8 and 9, the state is required to demonstrate improvement on national standards that address those items. For CFSR Item 6, national standard data is also available. The data for the national standards will be used to measure improvement for these three CFSR items.

Improvement in National Standards

In addition to the performance items associated with the safety, permanency and well-being outcome addressed in the PEP, Wisconsin must also demonstrate statewide improvement on federal standards related to child safety and permanence. These national standards are established using safety data reported to the federal National Child Abuse and Neglect Data System (NCANDS) and foster care/permanence data reported to the Adoption and Foster Care Analysis Reporting System (AFCARS). State performance is measured based on NCANDS and AFCARS data, or with ACF approval, based on alternate state data sources.

For the federal CFSR report, Wisconsin's ratings for the national standards were determined using FFY 2001 permanency and CY 2001 safety information data submitted prior to the August 2003 CFSR on-site review. The 2001 data predated implementation of the Wisconsin Statewide Automated Child Welfare Information System (WiSACWIS), which now provides more reliable and consistent information. To establish better baselines for setting performance improvement goals, the ACF Chicago Regional Office requested that Wisconsin submit updated information for 2002 and 2003. The 2003 data will be used as the baseline for the setting PEP improvement targets and the data for 2001 and 2002 will allow for performance trend analysis.

Based on the 2003 data, Wisconsin meets the national standards for Safety Outcome 2 and Permanency Outcome 4. For Safety Outcome 1 and Permanency Outcomes 1- 3, Wisconsin does not meet the national standards and must address these outcomes in the PEP. DCFS will commit to achieve the minimum improvement targets based on the sampling margin of error for these four outcomes by the end of the PEP period. The baseline levels and proposed improvement targets are shown in the following chart. The performance targets will be finalized following review by the Children's Bureau data unit of the 2003 data submitted by DCFS.

The PEP action steps are designed to improve state achievement of the national standards as well as state performance on specific CFSR outcome items. The following action steps are expected to improve achievement of the national standards:

- Safety Outcome 1 - Recurrence of maltreatment is affected by Action Steps A and B.
- Permanency Outcome 1 - Re-entry to care is affected by Action Steps C and D.
- Permanency Outcome 2 - Time to reunification is affected by Action Steps D, F and H – K.
- Permanency Outcome 3 - Time to adoption is affected by Action Steps D and O.

DCFS will continue to analyze current performance trends and work with ACF to review the improvement targets over the duration of the two-year PEP period. As 2004 and 2005 data become available, the performance trends will be re-evaluated to determine if adjustments should be made to the performance targets. While Wisconsin may seek to have the performance targets adjusted in relative terms, the improvement target will always remain the minimum improvement increment based on the sampling margin of error for the particular national standard; or if the actual Wisconsin performance is closer to the standard than the sampling margin of error, then the improvement target will be the difference between the actual performance and the national standard.

Wisconsin Achievement of National Standards					
National Standards	National Standard (Percent)	WI Data 2001 (Percent)	WI Data 2002 (Percent)	WI Data 2003 (Percent) Baseline	Minimum Improvement Increment (Percent)
Safety Outcome 1 – Recurrence of Maltreatment Of all children who were victims of substantiated maltreatment report in the first 6 months of the year, what percent were victims of another substantiated report within a 6-month period? <i>Source: Alternate Data</i>	6.1 or less	6.99	6.04	7.13	0.90
Safety Outcome 1 – Maltreatment While in Care Of all children in out-of-home care during the year, what percent experienced maltreatment by foster parents or facility staff members? <i>Source: Alternate Data</i>	0.57 or less	0.61	0.26	0.30	Standard Met
Permanency Outcome 1 – Re-entry to Care Of all children who entered out-of-home care during the year, what percent were re-entering care within 12 months of a prior out-of-home care episode? <i>Source: AFCARS</i>	8.6 or less	25.5	22.2	21.5	1.35
Permanency Outcome 1 – Timely Reunification Of all children reunified from out-of-home care during the year, what percent were reunified within 12 months of entry into out-of-home care? <i>Source: AFCARS</i>	76.2 or more	71.0	66.5	65.2	2.42
Permanency Outcome 1 – Timely Adoption Of all children adopted from out-of-home care during the year, what percent were adopted within 24 months of their entry into out-of-home care? <i>Source: Alternate Data</i>	32.0 or more	21.2	17.5	17.8	2.90
Permanency Outcome 1 – Placement Stability Of all children in out-of-home care during the year for less than 12 months, what percent experienced no more than 2 placement settings? <i>Source: AFCARS</i>	86.7 or more	93.8	92.3	92.6	Standard Met

For example, the minimum improvement increment for Safety Outcome 1 is 0.9% and the national standard is 6.1%. Based on CY 2003 data, the Wisconsin performance is estimated at 7.13% so the minimum increment of 0.9% applies and the PEP improvement target is therefore 6.23%. If the actual state performance was 6.5%, then the improvement target would be 6.1%.

As with the CFSR outcome items, failure to achieve improvement targets for the four national standards that must be addressed in the PEP could result in penalties to Wisconsin. Factors such as data quality issues, caseload dynamics, changes in federal or state policy, and the available resources for child welfare service delivery can have profound impacts on the state's performance on the national standards. The minimum improvement targets established for the PEP are prudent, however, state will strive to exceed the minimum improvement targets. To ensure the achievement of the overall statewide improvement targets, Wisconsin may establish state-only performance targets for particular groups of children or groups of counties to allow improvement efforts to be concentrated on particular sub-populations within the entire caseload.

Wisconsin's performance on the national standards over the period of 2001 to 2003 is affected by the alternate data collection methodology, transition to the WiSACWIS system and caseload trends. For example, the fluctuation in the performance for the Recurrence of Maltreatment standard appears to be related to the sampling method used to collect the data, with much of the variation attributable to the large driver counties other than Milwaukee. For the Maltreatment While in Care standard, 2001 had an unusually large number of maltreatment incidents with 2002 and 2003 reflecting more normal levels of performance. The improvement in performance for the Re-entry to Care standard from 2001 to 2003 may be related to more complete tracking of all types of placements in WiSACWIS versus the prior HSRS system. Conversely, the decline in performance for the Timely Reunification standard from 2001 to 2003 appears to be attributable to the conversion to WiSACWIS more accurately measuring the length of the foster care episode. Performance on this standard will likely further decline in 2004 reflecting the full statewide rollout of WiSACWIS. For the Timely Adoption standard, the decline in performance from 2001 to 2003 occurred during a period of record increases in the number of adoptions, including many adoptions of children who had been in foster care for an extended period. This measure in particular shows the sensitivity of the permanency national standards using AFCARS data focusing on exits from care rather than longitudinal approaches that look at cohort groups over time. The Placement Stability standard appears to be unaffected thus far by the conversion to WiSACWIS.

DCFS will also explore the development of alternate or supplemental measures for the safety and permanency objectives that the national standards are designed to measure. While the national standards are the official outcome measures for the CFSR process, the federal measures have limitations due to the nature of the data used. The AFCARS data used for permanency measures is limited because the data is focused on exits from care. The use of longitudinal data and tracking entry cohorts of children over times will allow for a more robust analysis of permanency outcomes. The NCANDS data used for safety measures is limited by the variation in the use of substantiation for child abuse and neglect reports. As Wisconsin re-evaluates its use of the substantiation finding, consideration will be given to possible alternate safety measures. State progress on the development of alternate safety and permanency measures will be reported in the quarterly progress reports. As alternate measures become available, the alternate data will be included in the quarterly reports to supplement the national standards information.

Summary of Data Measurement Approaches

This section summarizes the approaches that will be used to establish baseline data, set improvement goals and measure the extent of improvement for the CFSR performance items and the national standards. Additional detail is provided in Appendix D to the PEP.

Baseline Measures

Outcome Items: For the 17 CFSR outcome items, the baseline performance levels will initially be based on the results of the August 2003 CFSR on-site review. As described previously, due to the unreliability of the CFSR scores as indicators of statewide performance, additional case reviews will be conducted and WiSACWIS reports developed to provide additional baseline information. The additional case reviews are described in the PEP Matrix Action Step Q.2. The specific WiSACWIS reports that will be developed are described in Action Steps A through M. As additional information becomes available, DCFS will work with ACF to update the baselines.

National Standards: For the national standards, the measurement approach will involve a combination of federal AFCARS data and alternate state data. For the national standards associated with Safety Outcomes 1 and 2 and Permanency Outcome 3, the baseline measures are based on alternate data collection approaches approved by the Children's Bureau.

- For Safety Outcome 1, an estimate of the state's maltreatment recurrence rate is derived using a sample from the first half of the calendar year and identifying those cases having a substantiated finding of maltreatment in the six months prior to or after the date of the report indicated in the sample. The baseline measure is based on CY 2003 data.
- For Safety Outcome 2, state child abuse and neglect data is used to calculate the number of children who were subjects of substantiated maltreatment by a foster parent or a group home staff during CY 2003. The number of maltreated children is divided by the cumulative number of children in out-of-home care during the same one-year period. The count of children in care is computed from the same data used to generate the AFCARS foster care files.

Based on the CY 2001 data used for the CFSR federal report, Wisconsin originally did not meet this national standard. The CY 2002 and 2003 data show that Wisconsin now meets this standard. Since the state is currently in compliance with this state, no improvement target will be established for the PEP.

- For Permanency Outcomes 1 and 2, the state will rely on the data submitted for AFCARS foster care purposes to generate baseline performance levels. The state will use the results provided by the Children's Bureau based on the annualized AFCARS file for FFY 2003. DCFS submitted updated AFCARS files for FFY 2003 for this purpose.
- For Permanency Outcome 3, the baseline performance level measure is based on data used to generate the adoption AFCARS file. The time to adoption rate is obtained using the adoption finalization dates as reported in the adoption AFCARS file for FFY 2003 and reviewing case records to determine the most recent removal date to establish when the child entered out-of-

home care. A spreadsheet is created listing the child's most recent removal date and adoption finalization date. The time to adoption calculation is based on the amount of time between these two dates.

- For Permanency Outcome 4, the state has consistently met the national standard based on AFCARS data. Since the state is currently in compliance with this state, no improvement target will be established for the PEP.

Performance Improvement Goals

Initial performance goals have been established for each of the 17 CFSR outcome items and the four national standards to specify the minimum improvement necessary for a given item or standard. While the state will carry out its efforts to achieve improvements beyond the minimum expectations, data quality concerns related to the national standards and lack of data on the individual performance items prevent the state from fully knowing where to gauge its actual performance and establishing realistic performance improvement goals. Once data sources have been refined and data quality issues for AFCARS have been addressed, DCFS will review state performance with the federal ACF to assess the validity of the initial baseline levels, establish revised baselines and modify improvement goals accordingly.

Measuring Improvement in Performance

Outcome Items: Improvements for each of the 17 outcome items will be measured based largely on the results of the CFSR-style quality assurance case reviews that will be conducted on a regular cycle with counties statewide. Additional information to measure performance will be obtained from WiSACWIS reports in the process of being developed as explained in the PEP Matrix.

National Standards: Improvements in each of the required national standards will be measured and monitored by using the state's WiSACWIS reports. Coding associated with these reports is modeled after the federal syntax used to generate a state's results on the national standards and has been reviewed by the Children's Bureau. Federal AFCARS and NCANDS data can be used to measure state achievement of improvement goals starting with FFY 2005.

Wisconsin will continue to analyze current performance trends and will work with ACF to review the improvement goals over the duration to the PEP period, and the performance targets will be re-evaluated if necessary based on updated baseline information.

Additional Information

Additional detail regarding the Wisconsin approaches to establishing baseline data and measuring improvement in the national standards is provided in Appendix D. This appendix includes the DCFS work plan for developing CY 2003 and FFY 2003 baseline data for the PEP. The approaches in the Appendix D were reviewed and approved by the Children's Bureau in a document submitted on June 24, 2004. Appendix D has been further updated to this final version the PEP. The 2003 baseline information along with 2002 information that can be used for trend analysis will be submitted separately to ACF by September 30, 2004.

PEP Contact Persons

DCFS contact persons for the Wisconsin PEP are:

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2) PEP action step implementation:

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Background Materials

Background materials for the PEP, including the Statewide Assessment for the CFSR, the federal CFSR report and other materials about the Wisconsin CFSR review and PEP development can be found at the following web site address:

<http://dhfs.wisconsin.gov/cwreview/cfsr.htm>

References are made in the PEP to the 5-year Child and Family Services Plan submitted in June 2004. The 5-year plan can be found at the following web site address:

<http://dhfs.wisconsin.gov/cwreview/fedPlans/5YearPlan2005-2009.PDF>

References are also made to Governor Doyle's KidsFirst agenda released in April 2004. The KidsFirst document can be found at the following web site address:

<http://www.wisgov.state.wi.us/docs/kidsfirst.pdf>